

STATE OF INDIANA	)	THE KOSCIUSKO _____ COURT
	)	
COUNTY OF KOSCIUSKO	)	CAUSE:
		43D04-2004-CT-000032
CYNTHIA HAMDIN,	)	
Plaintiff,	)	
	)	
V	)	
	)	
WALMART SUPERCENTER,	)	
Defendant.	)	

### **COMPLAINT FOR DAMAGES**

Comes now the Plaintiff, Cynthia Hamdin, by counsel, and asserts the following in support of her claim against the Defendant, Walmart Supercenter:

1. At all times relevant herein, Plaintiff, Cynthia Hamdin, resided in the City of Warsaw, County of Kosciusko, State of Indiana.
2. At all times relevant herein, Defendant, Walmart Supercenter, with its principal place of business located at 2501 Walton Blvd, City of Warsaw, State of Indiana, 46582
3. On or about April 19, 2019, at or around 2:30 pm, Plaintiff, Cynthia Hamdin was shopping at the Walmart Supercenter.
4. Plaintiff, Cynthia Hamdin, was walking through the aisle/walkway in the grocery department when she slipped on some unpackaged deli meat which had been dropped and left on the floor. This caused her to lose her balance and fall on the floor.
5. The Plaintiff initially fell onto both of her knees and then onto her buttocks. As she fell, she heard loud pops in her lower back and pelvic area and began to immediately experience pain in her neck, back, and legs.
6. Defendant, Walmart Supercenter, were careless and negligent in one or more of the following respects:

- (a) Failing to comply with regulations regarding aisles/walkways on its property;
- (b) Failing to maintain and keep the aisles/walkways in safe condition for the use of customers;
- (c) Failing to inspect the premises for dangerous conditions such as the presence of noncompliant aisles/walkways;
- (d) Failing to exercise reasonable care for the Plaintiff while shopping in the store;
- (e) Creating a dangerous condition by allowing noncompliant aisles/walkways to be on the premises which were to be utilized by persons walking from aisle to aisle.

7. As a direct and proximate result of the negligence of Defendant, the Plaintiff, Cynthia Hamdin, suffered severe and permanent injuries, endured great physical pain, incurred substantial medical expenses, and will continue to incur such damages in the future.

WHEREFORE, Plaintiff prays for judgment against the Defendant in an amount which will fully and fairly compensate her for injuries and damages, for costs of this action, for interest as allowed by law, and for all other just and proper relief in the premises.

Respectfully submitted,

/s/Isaiah P. Vanderpool  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served on the following by U.S. Mail or by IEFS on this 2nd day of April, 2019:

/s/Isaiah P. Vanderpool

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